To: Gwen Massenburg, Stuart Hill US EPA

From: John J. Hulewicz, Elkhart County Health Department (ECHD)

Re: Public comments on proposed ROD for Himco Dump Site

Date: April 30, 2003



The following comments are to be considered as part of the ROD for the Himco Dump Site in Elkhart Indiana.

- 1. There are three resident homes located on County Road 10 southwest of the sites that were never hooked up to municipal water supplies. These homes are located east of County Road 3 near the mobile home park yet in close proximity to homes that were impacted. I believe these homes should be allowed connection to municipal water supplies to end any uncertainty as to potential spread of groundwater contaminants in a southern or southwesterly direction. Varied reports had previously indicated that generalized groundwater flow could move to the south or southwest. No other homes are in the near vicinity thus ending speculation as to potential exposures from groundwater in that area if these connections are made.
- 2. Homes that are connected to city water should not be burdened with excessive water bills by the municipality. An agreement should be reached with the City of Elkhart to charge an equitable fee for water usage. A previous template may have been created when municipal water was extended to the Conrail Superfund site, which is also in Elkhart.
- 3. The Elkhart County Groundwater Protection Ordinance requires the submission of well logs by certified well drillers within thirty days. The Elkhart County Health Department (ECHD) is requesting that well logs be submitted to the ECHD for all wells constructed or abandoned as part of the ROD.
- 4. Site security has been lacking for this location for a number of years. The ECHD is requesting that in addition to fencing the area of concern periodic patrols are paid for by the PRP(s) until the site can be utilized in an appropriate manner. The frequency of patrols should be on a daily basis however other frequency considerations could be met by additional site security agreed on by the PRP(s) and US EPA.
- 5. A critical element is often lacking in the ROD for superfund sites. This element is the ability to have medical questions answered pertinent to potential exposures individuals may have had from contaminates at the site. This is lacking in this ROD as well. The ECHD proposes that the PRP(s) be required to pay for non-partisan medical professionals such as Toxicologists, Oncologists, Epidemiologists or others capable of answering or researching answers to medical questions relevant to potential exposures due to the site. This could be presented in a public forum available to past and present residents of the impacted area. This panel could also receive written inquires for a period of time as agreed upon by the PRP(s) and US EPA. This same panel or similar panel would present a seminar at Elkhart General Hospital for other medical doctors who might encounter patients from the impacted area. This would allow those medical

professionals a better understanding of the exposure, short-term symptoms, long term symptoms and the types of signs to look for over time.